

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

Martin Renee Williams
Plaintiff

Civil No. 6:16-cv-00216

VS.
Michael Couvillon, et al.
Defendant

Magistrate Judge Hanna
BY CONSENT OF THE PARTIES

PRETRIAL ORDER

Trial Date: 10-01-2018

Pretrial Conference Date: 09-13-2018

Type of Trial: JURY BENCH

Estimated Length of Trial: 3-4 days

Trial Attorney Attending: Party/Claim Represented:

Harold Register, III
Timothy R. Richardson
Ronald S. Bryant

Martin Renee Williams
Michael Couvillon
Michael Couvillon

1. Jurisdictional Basis:

This Honorable Court has jurisdiction in the above captioned case pursuant to Title VII of the Civil Rights Act of 1964.

2. Claims and Responses:

Plaintiff: Martin Williams, a black female, claims that she was terminated by Sheriff Michael Couvillion due to race and color discrimination. Martin Williams claims that several similarly situated individuals were not terminated after being involved in similar and/or worse investigations than the investigation that led to the termination of Martin Williams. The similarly situated individuals are either white males or white females.

Defendant's Response: Defendant claims that the plaintiff was terminated for violating departmental policy by conspiring to submit a falsified firearms certification score to the governing authority (the Louisiana P.O.S.T. Council) for the purpose of obtaining state supplemental pay. There are no individuals similarly situated to the plaintiff because no other member of the department is known to have ever committed a similar violation.

3. Issues of Fact and Issues of Law:

1. Was Martin Williams terminated on the basis of her protected class?
2. Was Martin Williams terminated for a legitimate non-discriminatory reason?

4. Stipulations:

5. Will Call Witnesses:

Plaintiff:

1. Martin Williams
2. Stan Suire
3. Cpt. Troy Hebert
4. Lt. William Vincent
5. Deputy Peter Dozier
6. Deputy Jessica Lacoste-Primeaux
7. Deputy Jacob Fontenot
8. Sgt. Bryan Kibodeaux
9. Deputy Megan Dumond
10. Any other witness listed by any other party herein
11. Any other witness listed in discovery.

Plaintiff reserves the right to supplement the aforementioned should the need arise.

Defendant:

1. Sheriff Michael Couvillon
2. Kirk Frith
3. Ron Sonnier
4. Stan Suire
5. Martin Williams
6. Sammy Laporte
7. Kevin Hebert

6. May Call Witnesses:

Plaintiff:

1. Lt. Raymond Thibodeaux
2. Deputy Chad Leblanc
3. Diego Zamora
4. William Thibodeaux
5. Jacauqline Noel
6. Kelly Cormier
7. Horace Richard
8. Kelly Gonzales
9. Milton Mouton
10. Annette Marceaux
11. Melissa Jordan
12. Bennett Lemaire
13. Robert Savoy
14. Byron Lopez
15. Any witness necessary for impeachment or rebuttal.
16. Any witness listed by any other party herein.

Plaintiff reserves the right to supplement the aforementioned should the need arise.

Defendant:

1. Any witness listed in the VPSO internal investigation report.
2. Any witness necessary for impeachment or rebuttal.
3. Any witness listed by any other party hereto.

7. Exhibits:

Plaintiff:

1. Any and all documents received herein through any party's responses to Answers to Interrogatories, Answers to Requests for Production of Documents, and Answers to Requests for Admissions.
2. Document entitled, "Statement of: Sergeant Bryan Kibodeaux"
3. Medical Record from Gulf Regional Occupational Medicine Center
4. Verification of Salary from Vermillion Parish Sheriff's Office
5. Verification of Salary from UPS
6. Any document or thing necessary for impeachment or rebuttal purposes.
7. Any exhibit listed by any other party herein.

Plaintiff reserves the right to supplement the aforementioned should the need arise.

Defendants:

1. Martin Williams's Vermillion Parish Sheriff's Office Personnel File including disciplinary reports, time sheets, evaluations, and promotions.
2. The Vermillion Parish Sheriff's Office Investigation File, which was attached as Exhibit

A-1 to Defendant's motion for summary judgment.
3. EEOC File reference Charge No. 461-2014-01957.
4. The Plaintiff's Complaint and Amended Complaints.
5. Any document or thing necessary for impeachment or rebuttal purposes.
6. Any exhibit listed by any other party hereto.
7. Defendant reserves the right to supplement the above list of exhibits.
8. Defendants may introduce the personnel files for any VPSO employees that plaintiff calls as a witness, depending upon the ruling of this Honorable Court in relation to the pending motions in limine.

8. Objections to Witness and Exhibit Lists:

Plaintiff: None

Plaintiff reserves the right to supplement the aforementioned should the need arise.

Defendant: Defendant objects to calling any Sheriff's employee or other witness for the purpose of eliciting testimony concerning the treatment of employees that were not similarly situated to the plaintiff, as more fully discussed in Defendant's pending motion in limine.

9. Counsel Affirmations:

The undersigned affirm the following:

1. Counsel are aware that exhibits are to be published to the jury by way of CD-ROM or the Visual Presenter unless consent of this Court is obtained upon a showing of impracticality or prejudice.
2. Counsel are familiar with the Visual Present and its operation.
3. Good faith settlement negotiations have been engaged in within one week prior to the pretrial conference.
4. Counsel are not aware of the need for any handicap provisions at this time.

09/04/2018
(Date)

/s/Ronald S. Bryant
(Signature of Counsel)

09/04/2018
(Date)

/s/Timothy R. Richardson
(Signature of Counsel)

09/04/2018
(Date)

/s/ Harold Register, III
(Signature of Counsel)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing joint status report was filed electronically with the Clerk of Court using the CM/ECF system and has been served upon counsel for all parties to this proceeding via electronic filing notification, facsimile, and/or first class United States mail, properly addressed, postage prepaid, at the last known address.

Signed at New Orleans and Lafayette, Louisiana, on this 4th day of September, 2018.

/s/Harold Register, III
(Signature of counsel)